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**From:** Gibbons, Thomas [Thomas.H.Gibbons@andeavor.com]  
**Sent:** 2/20/2018 8:05:36 PM  
**To:** North, Alexis [North.Alexis@epa.gov]; Loiacono, Sara [loiacono.sara@epa.gov]  
**Subject:** RE: MACT Subpart HH - Dehydrator Control Device Performance Testing

Thanks Alex and Sara!

*Note New Email and Company Name:*

**Thomas Gibbons**  
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**From:** North, Alexis [mailto:North.Alexis@epa.gov]  
**Sent:** Tuesday, February 20, 2018 9:46 AM  
**To:** Gibbons, Thomas <Thomas.H.Gibbons@andeavor.com>; Loiacono, Sara <loiacono.sara@epa.gov>  
**Subject:** RE: MACT Subpart HH - Dehydrator Control Device Performance Testing

Tom,

Sorry for the slow response, you got buried in my email avalanche.

Sara researched your questions and I agree with her summary below:

**1. Do EPA-listed models require an initial performance test?**

*I'd say **no**, they don't require an initial performance test.*

Reasoning: §63.772(e) states that "as an alternative to conducting a performance test under this section for combustion control devices, a control device that can be demonstrated to meet the performance requirements of §63.771(d)(1), (e)(3)(ii) or (f)(1) through a performance test conducted by the manufacturer, as specified in paragraph (h) of this section, can be used." Although §63.772(e)(3)(vi)(A) doesn't explicitly state that manufacturer-tested control devices are exempt from the initial performance test, the language above applies to both initial and periodic testing since testing requirements for both initial and periodic tests are included under subsections of §63.772(e).

**2. Do the combustors of the attached EPA list qualify for the exemption described in §63.772(e)(1)(vi)?**

*I'd say, **yes**, if you are using one of combustors on the most recent list that has submitted an acceptable (not under review) performance test.*

The most current spreadsheet published by EPA of combustion control devices for which EPA has received information on manufacturer's performance tests (<https://www.epa.gov/stationary-sources-air-pollution/performance-testing-combustion-control-devices-manufacturers>)

Thanks,

Alex

Alexis North, Environmental Scientist  
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**From:** Gibbons, Thomas [<mailto:Thomas.H.Gibbons@andavor.com>]  
**Sent:** Monday, February 5, 2018 4:18 PM  
**To:** North, Alexis <[North.Alexis@epa.gov](mailto:North.Alexis@epa.gov)>  
**Subject:** MACT Subpart HH - Dehydrator Control Device Performance Testing

Hi Alex,

I have a question about performance testing for EPA-listed enclosed combustion devices (e.g., enclosed combustors) used for dehydrator control under MACT Subpart HH. Attached is the current (December 2017) list of "Performance Testing for Combustion Control Devices, Manufacturers' Performance Test, NSPS OOOO/OOOOa and MACT HH/HHH".

MACT HH discusses performance testing in §63.772 (Test methods, compliance procedures, and compliance demonstrations). Specifically, §§63.772(e)(3)(vi)(A) and (B) discuss initial and periodic performance testing requirements:

(vi) The owner or operator shall conduct performance tests according to the schedule specified in paragraphs (e)(3)(vi)(A) and (B) of this section.

(A) An initial performance test shall be conducted within 180 days after the compliance date that is specified for each affected source in §63.760(f)(7) through (8), except that the initial performance test for existing combustion control devices (*i.e.*, control devices installed on or before August 23, 2011) at major sources shall be conducted no later than October 15, 2015. If the owner or operator of an existing combustion control device at a major source chooses to replace such device with a control device whose model is tested under §63.772(h), then the newly installed device shall comply with all provisions of this subpart no later than October 15, 2015. The performance test results shall be submitted in the Notification of Compliance Status Report as required in §63.775(d)(1)(ii).

(B) Periodic performance tests shall be conducted for all control devices required to conduct initial performance tests except as specified in paragraphs (e)(3)(vi)(B)(1) and (2) of this section. The first periodic performance test shall be conducted no later than 60 months after the initial performance test required in paragraph (e)(3)(vi)(A) of this section. Subsequent periodic performance tests shall be conducted at intervals no longer than 60 months following the previous periodic performance test or whenever a source desires to establish a new operating limit. The periodic performance test results must be submitted in the next Periodic Report as specified in §63.775(e)(2)(xi). Combustion control devices meeting the criteria in either paragraph (e)(3)(vi)(B)(1) or (2) of this section are not required to conduct periodic performance tests.

(1) A control device whose model is tested under, and meets the criteria of, §63.772(h)

In MACT HH, §63.772(h) refers to "Performance testing for combustion control devices—manufacturers' performance test".

Clearly, EPA-listed models [i.e., "model is tested under, and meets the criteria of, §63.772(h)"] do not require periodic performance testing. My question is whether or not such models require an initial performance test.

MACT HH performance test exemptions are discussed in §63.772(e)(1)(iv):

(1) The following control devices are exempt from the requirements to conduct performance tests and design analyses under this section:

(vi) A control device for which a performance test was conducted for determining compliance with a regulation promulgated by the EPA and the test was conducted using the same methods specified in this section and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process changes.

Do the combustors on attached EPA list qualify for the exemption described above in §63.772(e)(1)(iv)?

Note also that under NSPS OOOOa, EPA-listed combustors are exempt from performance testing per 40 CFR §60.5413a(a)(7):

(a) Performance test exemptions. You are exempt from the requirements to conduct performance tests and design analyses if you use any of the control devices described in paragraphs (a)(1) through (7) of this section.

(7) A control device whose model can be demonstrated to meet the performance requirements of §60.5412a(a)(1) or (d)(1) through a performance test conducted by the manufacturer, as specified in paragraph (d) of this section.

Thanks for your help!

Best Regards,  
Tom

*Note New Email and Company Name:*

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